

Exhibit B

From: [Adam Slater](#)
To: [Goldberg, Seth A.](#); [Valsartan PEC Listserv](#)
Cc: [Priselac, Jessica](#); [Schwartz, Barbara](#); [Hill, Coleen W.](#); [CCT@Pietragallo.com](#); [Jason M. Reefer](#); [Frank H. Stoy](#); [Cohen, Lori \(Shld-Atl-LT\)](#); [Lockard, Victoria D. \(Shld-Atl-LT\)](#); [Harkins, Steven M. \(Assoc-ATL-LT\)](#); [Jeff](#); [Sarah.Johnston@btlaw.com](#); [Kristen](#)
Subject: Re: Valsartan MDL Coordination Order
Date: Thursday, January 21, 2021 3:37:34 PM

EXTERNAL TO GT

Seth - I think we need to discuss. There is nothing happening in NJ and I don't see any need for this. Is someone pushing in NJ to conduct other discovery?

I'm not sure of the need for the letter you propose too. I think Judge Vanaskie has more than sufficient information available to him to understand the litigation, and at this point there really is not a need to prepare more letters or briefs with everything else that is going on.

Of course, we can discuss but that is the initial take.

Thank you,

Adam Slater

From: Goldberg, Seth A. <SAGoldberg@duanemorris.com>
Sent: Thursday, January 21, 2021 3:02 PM
To: Valsartan PEC Listserv <valpec@kirtlandpackard.com>
Cc: [Priselac, Jessica](#) <[JPriselac@duanemorris.com](#)>; [Schwartz, Barbara](#) <[BASchwartz@duanemorris.com](#)>; [Hill, Coleen W.](#) <[CWHill@duanemorris.com](#)>; [CCT@Pietragallo.com](#) <[CCT@Pietragallo.com](#)>; [Jason M. Reefer](#) <[JMR@Pietragallo.com](#)>; [Frank H. Stoy](#) <[FHS@Pietragallo.com](#)>; [CohenL@gtlaw.com](#) <[CohenL@gtlaw.com](#)>; [lockardv@gtlaw.com](#) <[lockardv@gtlaw.com](#)>; [harkinss@gtlaw.com](#) <[harkinss@gtlaw.com](#)>; [Jeff](#) <[jgeoppinger@ulmer.com](#)>; [Sarah.Johnston@btlaw.com](#) <[Sarah.Johnston@btlaw.com](#)>; [Kristen](#) <[Kristen.Richer@btlaw.com](#)>
Subject: Valsartan MDL Coordination Order

Counsel:

Attached is a draft "Coordination Order" that would coordinate discovery in the MDL and state court actions such that the MDL would be the lead action for purposes of discovery. Given that depositions have begun, we would like to propose the Court enter this order soon, and will let the Court know next week that we have made this proposal. Could you please let us know your view on this and whether you have any changes to the order that you would like to propose?

Also, we wanted to let you know that we will be proposing to Judge Vanaskie in next week's CMC submission that each side be permitted to submit a letter that provides an overview of

the litigation, including the identity of the parties and the claims and defenses, and that also provides information about the parties' discovery to date and key rulings Judge Kugler and Judge Schneider have entered. Happy to discuss.

Best,
Seth



For more information about Duane Morris, please visit <http://www.DuaneMorris.com>

Confidentiality Notice: This electronic mail transmission is privileged and confidential and is intended only for the review of the party to whom it is addressed. If you have received this transmission in error, please immediately return it to the sender. Unintended transmission shall not constitute waiver of the attorney-client or any other privilege.